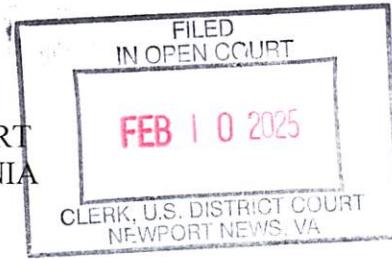


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
*Newport News Division*



UNITED STATES OF AMERICA, )  
v. ) CRIMINAL NO. 4:25-CR-4  
ROBERT CHAMBERS, JR., )  
(Counts 1 & 2) ) 18 U.S.C. §§ 922(a)(1)(A) and 2  
and ) Manufacturing and Dealing Firearms without  
RAEGAN LEWIS THOMAS, ) a License  
(Count 1) ) (Count 1)  
Defendants. ) )  
 ) 18 U.S.C. §§ 922(g)(1) and 924(a)(8)  
 ) Felon in Possession of a Firearm  
 ) (Count 2)  
 ) 18 U.S.C. § 924(d)  
 ) Criminal Forfeiture

**INDICTMENT**

FEBRUARY 2025 TERM - at Newport News, Virginia

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

(Manufacturing and Dealing Firearms without a License)

From on or about June 6, 2024, through on or about October 18, 2024, in the Eastern District of Virginia, the defendants, ROBERT CHAMBERS, JR. and RAEGAN LEWIS THOMAS, being unlicensed importers, manufacturers, or dealers, did knowingly engage in the business of manufacturing and dealing in firearms, to wit: a completed and functioning privately manufactured, 9mm, semiautomatic handgun, with an aftermarket barrel and FN Herstal slide, and a completed and functioning privately manufactured .300 blackout, semiautomatic rifle, with an aftermarket barrel, hand rails, Daniel Defense iron sights, and suppressor, manufactured with parts that had been shipped and transported in interstate and foreign commerce.

(In violation of Title 18 United States Code, Sections 922(a)(1)(A) and 2).

COUNT TWO

(Felon in Possession of a Firearm)

On or about October 18, 2024, in the Eastern District of Virginia, the defendant, ROBERT CHAMBERS, JR., having knowingly been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess a firearm, to wit: a completed and functioning privately manufactured .300 blackout, semiautomatic rifle, with an aftermarket barrel, hand rails, Daniel Defense iron sights, and suppressor, manufactured with parts, and with ammunition, that had been shipped and transported in interstate and foreign commerce.

(In violation of Title 18 United States Code, Sections 922(g)(1) and 924(a)(8)).

**FORFEITURE**

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of any of the violations alleged in this indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any firearm or ammunition involved in or used in the violation.
2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(In accordance with Title 18, United States Code, Section 924(d)(1)).

Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

United States v. Robert Chambers, Jr., et al.  
Criminal No. 4:25-CR-\_\_\_\_

A TRUE BILL:

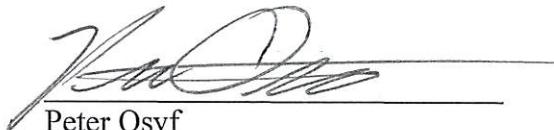
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FOREPERSON

ERIK S. SIEBERT  
UNITED STATES ATTORNEY

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